

DAHIYA LAW OFFICES LLC

Attorneys

75 Maiden Lane Suite 506
New York, New York 10038
Tel: 212-766 8000 Fax: 212 766 8001
karam@legalpundit.com

Via: ECF and Email

To the

Hon. Judge Stuart Bernstein
United States Bankruptcy Judge
One Bowling Green
New York NY 10004-1408

November 30, 2020

Adjournment of Hearing on December 8, 2020 requested
Bronx Miracle Gospel Tabernacle Word of Faith Ministries Inc.
Case No. 19-12447

Dear Judge Bernstein:

I am the counsel for the Church, Bronx Miracle Gospel Tabernacle Word of Faith Ministries Inc. (Bronx Miracle or Church). I am writing to request an adjournment of the hearing scheduled for December 8, 2018 to any date after January 15, 2020 (January 20, 2021 is good for us). There is absolutely no prejudice to the Operating Trustee. If there is any prejudice, it is to the Church and its members. And if the Court finds it exigent, then to December 16, 2020.

The Church and its members are injured by the sale of the Church. The Church was sold, superspeed, for \$2.8 million. The same Church is now listed for sale at 5.5 million dollars by the buyer. To add salt to this injury, we are told that 2 million went to Thomas Borek, left is \$800,000. Operating Trustee and her firm has now requested *half a million dollars* in legal fees, leaving only a paltry \$300,000 for the Church. That would not be enough to cover the salary compensation etc. owed to the Church Pastor and the staff and also the attorneys fees for the Church representation. We are amending the schedules to reflect the proper number. We are now at a precarious crossroad.

The Church opposes the fees demanded by the Operating Trustee in all aspects and also wants to contest the objections to the claims of the members of the Church. We have not been able to access the records for evidentiary support of the claims, despite our request to the Operating Trustee to handover the computers and files to us. We also wrote to Your Honor to direct the Operating Trustee to handover the Church files and computers. Because of Covid-19 and other health related issues, we have not been able to go through the information regarding the schedules and claims in detail. We need extension of time and access to Church records to prepare our opposition to the fees and claim objections. Wherefore we request that the Court either adjourn the January 20, 2021 or at minimum by 10 days (this might be too short a time considering the Covid and holidays). January 20, 2021 is best for us. We are grateful to the Court to accommodate us in interest of justice.

Yours faithfully,

/s/

Karamvir Dahiya